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# California Regional Water Quality Control Board Central Valley Region

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**TO:** RUSSELL W. WALLS  
Senior Engineer

**FROM:** ANTHONY MEDRANO  
Sanitary Engineering Associate

**DATE:** 23 September 2005

**SIGNATURE:** \_\_\_\_\_

**SUBJECT: WESTLANDS DISCHARGE COALITION ANNUAL MONITORING REPORT,  
CONDITIONAL WAIVER OF WASTE DISCHARGE REQUIREMENTS FOR  
DISCHARGE FROM IRRIGATED LANDS RESOLUTION NO. R5-2003-0105 AND  
MONITORING AND REPORTING PROGRAM ORDER NO. R5-2003-0826**

## **Background/Administrative Review:**

On 29 June 2005 the Westlands Discharge Coalition (Coalition) submitted their Annual Monitoring Report (Annual Report) in accordance with the Conditional Waiver of Waste Discharge Requirements for Discharge From Irrigated Lands, Resolution No. R5-2003-0105 (Waiver) and Monitoring and Reporting Program Order No. R5-2003-0826 (MRP). The due date for the Annual Report was 1 April 2005, making the subject submittal nearly three months overdue. On 9 June 2005 staff organized a meeting with the Coalition to discuss the lack of action on the Coalition's part. The Coalition Manager did not attend the meeting, however, the Coalition's Resource Analyst did attend. During that meeting, we were informed by the Coalition's representative that due to medical reasons, the Coalition did not collect any monitoring samples and has been unable to complete the Annual Report. Staff reminded the representative that it is the Coalition's responsibility to maintain sufficient resources to perform the work as prescribed in the Waiver.

A review of the report reveals that the Coalition did not perform any stormwater sampling as required in the MRP. Some general physical parameter data that was collected by others was reported for both sampling sites on the Arroyo Pasajero stream. The subject Annual Report did not contain tabulated analytical data of stormwater samples, no chain of custody forms, no laboratory sheets, and no quality assurance/quality control data for the majority of the constituents listed in the Phase 1 monitoring list in the MRP.

The MRP states that a "*Pesticide Use Evaluation must be conducted to determine the pesticide use pattern in land areas upstream of the monitoring sites.*" The Pesticide Use Evaluation must include timing of pesticide applications, application rates, the amounts of pesticide applied, and the points of application. No Pesticide Use Evaluation was performed. A list of crops grown and a list of pesticides

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used during the winter storm months were included in the Annual Report but there was no correlation made for pesticide/land use patterns.

According to MRP Order No. R5-2003-0826 under the Management Practice Effectiveness and Implementation Tracking section, information must be collected from Dischargers on the type of management practices that are being used, the degree to which they are being implemented within the watershed, and how effective they are in protecting waters of state. The subject Annual Report did not contain this information.

No communication reports were provided during the last stormwater-monitoring season.

### **Watershed Description/Observations:**

The area covered by the Coalition averages 15 miles in width and extends 70 miles from the City of Mendota to the north to Kettleman City to the south. The Coalition area covers over 604,000 acres of which 570,000 acres are irrigable. The Westlands Water District has assumed the lead role of the subject Coalition. According to Coalition representatives, approximately 83 percent of the farmers in the water district are currently active members of the Coalition.

The Watershed Evaluation Report provided by the Coalition indicates it does not drain any surface irrigation water or subsurface drainage to waters of the State. Other Coalition's participating in the Waiver program have also indicated that they have no irrigation water or subsurface drainage to waters of the State, however, after staff inspections this was found to be inaccurate. Staff recommends that the Coalition perform a detailed survey of the Coalition area to identify any possible locations where any irrigated drainage might be occurring.

The Watershed Evaluation Report does indicate that the Coalition contains lands that potentially could flood during a severe storm event and could possibly flow to waters of the State. The Coalition area encompasses two main sub-watersheds, the Arroyo Pasajero watershed and the Panoche-Silver Creek watershed.

The Arroyo Pasajero watershed lies within southwest Fresno County approximately 50 miles southeast of the City of Fresno. The watershed extends from the crest of the Coastal Range through Pleasant Valley to the San Joaquin valley floor. The Arroyo Pasajero stream is an ephemeral stream that runs along the west side of the San Joaquin Valley near the City of Coalinga. The upper watershed of the Arroyo Pasajero consists of four major tributaries; Los Gatos Creek, Warthan Creek, Jacalitos Creek, and Zapato Chino Creek. The final reach of the Arroyo Pasajero is about six miles east of Interstate 5.

The Panoche-Silver Creek watershed is located upstream and to the west of the City of Mendota and is approximately 50 miles west of the City of Fresno. The Panoche-Silver Creek watershed lies within Fresno and San Benito Counties on the western edge of the San Joaquin Valley. The watershed encompasses approximately 300 square miles upstream of Interstate 5, and ranges in elevation from 500 feet at Interstate 5 to 5,000 feet near the upper watershed boundary.

The approved MRP designates two monitoring sites as follows:

1. The Arroyo Pasajero between Interstate 5 and the Westside Detention Basin
2. The Panoche-Silver Creek between Interstate 5 and the City of Mendota

The Annual Report, however, cites two additional sampling locations. They are as follows:

3. Belmont Avenue and Panoche-Silver Creek, and
4. Arroyo Pasajero and Gale Avenue

The Annual Report contains a map of the Coalition area that shows the monitoring sites.

### **Sampling:**

According to the Annual Report no flow was observed at any of the sampling locations from October 2004 through February 2005 (Table 1). Given the record season of rainfall last year, it seems highly unlikely that there was no water flowing at any of the sampling points during the whole storm season. In addition, the Annual Report does not provide specific times, dates or any other type of verification that flow was not occurring when the sampling sites were visited. A more definitive protocol needs to be established for triggering sampling for stormwater sampling events. Future sampling attempts need to be documented with field data sheets and photographs.

Table 2, *Monitoring Stations and Samples*, and Table 3, *Monitored Constituents*, contain no data whatsoever. Table 4 Field, General/Physical Analysis Summary, in the Annual Report appears to contradict Table 1. A review of Table 1 indicates that there was no flow at any of the sampling points; yet, Table 4 contains analytical data for water samples on two specific dates in January 2005 for the monitoring site at Arroyo Pasajero and Interstate 5 and on six specific dates during the same period for the monitoring site at Arroyo Pasajero and Gale Avenue. If stormwater was present, surface water samples should have been collected. No sediment samples were collected at any of the sample locations. The Annual Report did contain a table with flow data that was provided by an outside source, however, it appears that this data was not collected from any of the approved sampling points.

Overall, of the few physical parameters that were observed in the stormwater samples collected at Arroyo Pasajero and Gale Avenue and at Arroyo Pasajero and Interstate 5, most appeared to be within acceptable limits with the exception of Total Suspended Solids (TSS) on 3 January 2005 and 11 January 2005 collected at Arroyo Pasajero and Interstate 5 that were observed to be 12,740 and 14,000 mg/l, respectively.

### **Conclusions:**

After reviewing the subject Annual Report from Westlands Discharge Coalition, I have concluded the following items need to be addressed, provided, and/or corrected:

1. Future Annual Reports are to be completed and submitted by the prescribed deadline. The Coalition needs to provide the necessary resources to complete all work required by the Waiver and the MRP.
2. The Annual Report did not include an evaluation to determine patterns of pesticide/herbicide use in areas within the coalition, nor, was there any attempt to correlate the pesticide/herbicide data presented in the Annual Report with specific irrigated lands. This evaluation needs to be completed and provided to complete the subject report.
3. A detailed survey of the Coalition area needs to be performed to identify any possible locations where any irrigated drainage might be occurring.
4. The sampling trigger for stormwater sampling needs to be modified. The current protocol that triggers sampling events does not appear to be adequate. A new sampling trigger needs to be developed and proposed.
5. *Table 4* in the Annual Report indicates that there was stormwater flow in the Arroyo Pasajero stream at both sampling locations on the stream, and, some general analysis was performed. However, no laboratory sheets were provided for the minimal analysis performed. In addition, the majority of constituents required to be analyzed were not included as part of the analytical efforts.
6. No sediment toxicity samples were collected in either sampling event. An alternate sampling site may need to be identified for future sediment sampling events.
7. Management Practice Effectiveness and Implementation Tracking information must be collected from Dischargers on the type of management practices that are being used, the degree to which they are being implemented within the watershed, and how effective they are in protecting waters of state. The Management Practice Effectiveness and Implementation Tracking information, as prescribed in the MRP, needs to be completed and submitted to complete the Annual Report.
8. The Pesticide Use Evaluation must include timing of pesticide applications, application rates, the amounts of pesticide applied, and the points of application. No Pesticide Use Evaluation was performed. A list of crops grown and a list of pesticides used during the winter storm months were included in the Annual Report, but there was no correlation made for pesticide/land use patterns. The Pesticide Use Evaluation needs to be provided to complete the subject Annual Report.